


#254 MTN. TO COMPEL

EXHIBIT AND WITNESS LIST

AO 187 (REV. 4/82)

PA Funding, LLC					Vs. SRS Management, LLC		DISTRICT COURT Western District of Texas (San Antonio Division)	
PLAINTIFF'S ATTORNEY Eric Terry					DEFENDANT'S ATTORNEY Patrick Huffstickler		DOCKET NUMBER 07-70143	
PRESIDING JUDGE Ronald B. King					COURT REPORTER Beth Chapa		TRIAL DATE(S) 12/18/07	
							FILED DEC 26 2007 U.S. BANKRUPTCY COURT BY  DEPUTY	
PLF. NO.	DEF. NO.	DATE OFFERED	MAR KED	ADMITTED	DESCRIPTION OF EXHIBITS * AND WITNESSES			
W-1		12/18/07	----	-----	Daniel S. Hostettler			
W-2		12/18/07	----	-----	James Travis Roberts, Jr.			
W-3		12/18/07	----	-----	William W. Lesley			
W-4		12/18/07	----	-----	Frank M. Harrison			
					EXHIBITS OF KELCY WARREN			
1		12/18/07	yes	12/18/07	Appraisal of the Lajitas Resort and Related Residential Development Prepared by PKF Consulting, dated 2/23/07			
2		12/18/07	yes	12/18/07	Brewster County Tax Rolls Regarding Real property of Lajitas Sales to Be Acquired			
3		-----	----	-----	Statement of Lot Sales (NO EXHIBIT FOR THIS #)			
4		12/18/07	yes	12/18/07	Lajitas Additional Assets Acquisition Summary (Demonstrative)			
5		12/18/07	yes	12/18/07	Debtors' file regarding surveyor contract with Trans Pecos Land Surveyors, Inc.			
6		12/18/07	yes	12/18/07	Affidavit of J. Travis Roberts, Jr.			
7		12/18/07	yes	12/18/07	Form of Surveyor Contract with Trans Pecos Land Surveyors, Inc.			
8		12/18/07	yes	12/18/07	Boquillas Beverage Company Valuation of Assets dated 12/17/07 prepared by Edwin W. Leslie, CHA			
9		12/18/07	yes	12/18/07	Lajitas Daily Revenue Report, Permit Listing and Beverage Inventory			
10		-----	---	-----	Summary of Schedules of Lajitas Utility Co., Inc.			

					<i>EXHIBITS OF PA FUNDING</i>
1		12/18/07	yes	12/18/07	Promissory Note in the Amount of \$12,500.00 from Lajitas Resort, Ltd. And Lajitas Real Estate, Ltd. To PA Funding, LC, dated 6/2/06
2		12/18/07	yes	12/18/07	Loan Agreement By and Among Lajitas Resort and Lajitas Real Estate as Borrower and PA Funding as Lender, dated 6/2/06
3		12/18/07	yes	12/18/07	Deed of Trust, Security Agreement, Financing Statement and Assignment of Rents and Leases Filed in Presidio County, Texas dated 6/2/06
4		12/18/07	yes	12/18/07	Deed of Trust, Security Agreement, Financing Statement, and Assignment of Rents and Leases filed in Brewster County, Texas dated 6/2/06
5		12/18/07	yes	12/18/07	Deposit Account Control Agreement Among Lajitas Real Estate, Ltd., PA Funding, LLC and JPMorgan Chase Bank, N.A., dated 6/2/06
6		12/18/07	yes	12/18/07	Security Agreement by Boquillas Beverage Company, dated 6/2/06
7		12/18/07	yes	12/18/07	Security Agreement by Lajitas Utility Co., Inc. Dated 6/2/06
8		12/18/07	yes	12/18/07	Security Agreement by Lajitas Real Estate, Ltd., dated 6/2/06
9		12/18/07	yes	12/18/07	Security Agreement by Lajitas Resort, Ltd., dated 6/2/06
10		12/18/07	yes	12/18/07	Guaranty Agreement by Boquillas Beverage Company, dated 6/2/06
11		12/18/07	yes	12/18/07	Guaranty Agreement by Lajitas Sales, LLC dated 6/2/06
12		12/18/07	yes	12/18/07	Guaranty Agreement by Lajitas Airport, Ltd., dated 6/2/06
13		12/18/07	yes	12/18/07	Guaranty Agreement by Lajitas Utility Co., Inc., dated 6/2/06
14		12/18/07	yes	12/18/07	Guaranty Agreement by Lajitas Management, LLC dated 6/2/06
15		12/18/07	yes	12/18/07	Guaranty Agreement by Austex Lajitas Enterprises, Ltd.. Dated 6/2/06
16		12/18/07	yes	12/18/07	Guaranty Agreement by Stephen R. Smith, dated 6/2/06
17		12/18/07	yes	12/18/07	Pledge Agreement by Lajitas Sales, LL C dated 6/2/06
18		12/18/07	yes	12/18/07	Pledge Agreement by Lajitas Management, LLC dated 6/2/06
19		12/18/07	yes	12/18/07	Pledge Agreement by Austex Lajitas Enterprises, Ltd., dated 6/2/06

20		12/18/07	yes	12/18/07	Pledge Agreement by Lajitas Resort, Ltd., dated 6/2/06
21		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Boquillas Beverage Company on Security Agreement (Filing No. 06-0020429316) dated 6/15/06
22		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Utility Co., Inc. on Security Agreement (Filing No. 06-0020428840) dated 6/15/06
23		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Real Estate, Ltd. on Security Agreement (Filing No. 06-0020429083) dated 6/15/06
24		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Resort, Ltd. on Security Agreement (Filing No. 06-0020428951) dated 6/15/06
25		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Sales, LLC on Pledge Agreement (Filing No. 06-0020429427) dated 6/15/06
26		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Management, LLC on Pledge Agreement (Filing No. 06-0020427829) dated 6/15/06
27		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Austex Lajitas Enterprises, Ltd. on Pledge Agreement (Filing No. 06-0020427930) dated 6/15/06
28		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Resort, Ltd. on Pledge Agreement (Filing No. 06-0020429538) dated 6/15/06
29		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Utility Co., Inc. on Deed of Trust (Filing No. 06-0020428173) dated 6/15/06
30		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Airport, Ltd. on Deed of Trust (Filing No. 06-0020428628) dated 6/15/06
31		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Resort, Ltd. on Deed of Trust (Filing No. 06-0020428395) dated 6/15/06
32		12/18/07	yes	12/18/07	UCC-1 Financing Statement for Debtor Lajitas Real Estate, Ltd. on Deed of Trust (Filing No. 06-0020428406) dated 6/15/06
33		12/18/07	yes	12/18/07	Release of Lien by Ramon M. Mimier, dated 06/28/06
34		12/18/07	yes	12/18/07	Loan Schedule / repayment of debt
					EXHIBITS OF SRS
3-8		12/18/07	NO	12/18/07	No Exhibits for these numbers

*Include a notation as to the location of any exhibit not held with the case file or not available because of size.